

Honorable Judge Ronald B. Leighton

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

RANDY RUSH,

Plaintiff,

vs.

THE BOEING COMPANY,

Defendant.

NO. 3:10-cv-05575-RBL

PLAINTIFF'S DISCLOSURE
OF EXPERT WITNESSES

The Plaintiff, RANDY RUSH, by and through the undersigned attorneys, makes this Disclosure of Expert Witnesses in accordance with FRCP 26(a)(2):

RETAINED EXPERTS

Plaintiff has not retained or specially employed any person to provide expert testimony in the case.

MEDICAL WITNESSES

Plaintiff anticipates that the medical witnesses listed below will testify:

1. Subject Matters:

- a. Plaintiff's injuries sustained in the automobile collision of June 20, 2006, including diagnosis,

PLAINTIFF'S DISCLOSURE
OF EXPERT WITNESSES - 1

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and prognosis, and not limited to the following:

1. Traumatic brain injury with cognitive dysfunction;
2. Left temporal bone fracture (skull fracture);
3. Left traumatic subarachnoid hemorrhage;
4. Left tentorial subdural hematoma;
5. Left scalp laceration;
6. C7 facet fracture;
7. Left pneumothorax (lung collapse);
8. Left rib fractures;
9. Left-sided hemiparesis;
10. Left-sided parasthesia (including left-sided facial weakness)
11. Diplopia (double vision);
12. Night blindness;
13. Motion sickness;

b. Plaintiff's need for workplace accommodation, including, but not limited to, the ability to work virtually due to the effects of the above listed injuries, and for quiet workspace for concentration due to mild cognitive dysfunction.

c. Plaintiff's past, present and future medical conditions and Plaintiff's needs for past, present and future need for workplace accommodations.

d. Communications with The Boeing Company regarding Plaintiff's needs for workplace accommodations.

PLAINTIFF'S DISCLOSURE
OF EXPERT WITNESSES - 2

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2. **Facts and Opinions:**

- a. That Plaintiff suffered the injuries listed above and that the injuries affected his ability to perform his job, including the essential functions of his job, at The Boeing Company without reasonable accommodations.
- b. That Plaintiff RANDY RUSH was capable of performing the essential functions of his job with reasonable accommodations, including virtual work.
- c. That Plaintiff's injuries are permanent and the need for reasonable accommodations based upon those permanent injuries.
- d. The nature and extent of Plaintiff's damages resulting from Defendant's conduct.

3. **Witnesses:**

- a. Dr. David J. Fordyce
Rehabilitation Institute of Washington
4300 Aurora Ave. North, Suite 100
Seattle, WA 98103
- b. Dr. Nasima Vira
Virginia Mason Issaquah Clinic
100 NE Gilman Blvd.
Issaquah, WA 98027
- c. Dr. John Roberts
Virginia Mason Medical Center
1100 9th Ave.
Seattle, WA 98101
- d. Dr. Michael Rosenfield
Emerald City Medical Arts
16 Roy Street
Seattle, WA 98109

PLAINTIFF'S DISCLOSURE
OF EXPERT WITNESSES - 3

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d. Dr. Traci Arzillo
Dr. Amy Morris
Dr. Andrew Solomon
Dr. Robert Luu
Dr. Christina Gilmore
Including all other providers at:
Harborview Medical Center
325 9th Ave.
Seattle, WA 98104-2499

DATED this 15th day of March, 2011.

ALBERTSON LAW OFFICES


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PLAINTIFF'S DISCLOSURE
OF EXPERT WITNESSES - 4

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